

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

TRACY DEBOSE LAMPKIN,)	
)	
Plaintiff)	
)	CIVIL ACTION NO.
v.)	1:06-CV-538-WKW
)	
UNITED PARCEL SERVICE)	
)	
Defendant.)	
_____)	

PLAINTIFF'S REQUEST FOR ADMISSIONS OF FACTS
AND GENUINNESS OF DOCUMENTS

Plaintiff Tracy Lamkin, requests defendant United Parcel Service within 30 days after service of this request to make the following admissions for the purpose of this action only and subject to all pertinent objections to admissibility which may be interposed at trial:

That each of the following statements is true:

1. That Plaintiff Tracy Lamkin was under the immediate supervision of Robert Icenogle in the position of Local Support Supervisor.
2. That Plaintiff Tracy Lamkin made reports of discrimination against her supervisor Robert Icenogle to Human Resources.

3. That plaintiff received good performance reviews before Mr. Icenogle became her immediate supervisor.
4. On or about February 2005, Mr. Icenogle discouraged the Plaintiff from applying for an OMS position indicating that it would require a pay cut.
5. On or about September 2005, Plaintiff made a complaint to Tommy Davidson in the Dothan Center Human Resources department regarding her discriminatory treatment.

This 10th day of July 2007.

Respectfully submitted,

/s/Crystal M. James
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